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Attorneys for Defendant
Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES HYDE IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MEMORANDUM REGARDING
ADVERSE INFERENCES TO BE DRAWN
FROM ANTHONY LEVANDOWSKI'S
ASSERTION OF THE FIFTH
AMENDMENT**

I, Hayes Hyde, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff's Administrative Motion to File Under Seal Portions of Its Memorandum Regarding Adverse Inferences to be Drawn from Anthony Levandowski's Assertion of the Fifth Amendment.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Memorandum	Highlighted Portions

3. The highlighted portions of the Memorandum include highly confidential, sensitive business information relating to the terms of Otto Trucking's agreements that is not publicly known, and this information's confidentiality is strictly maintained. I understand that this information could be used by competitors to Otto Trucking's detriment, including in the context of negotiating business deals. If such information were made public, I understand Otto Trucking's competitive standing, and in particular, its ability to negotiate business deals, could be significantly harmed.

4. Defendants' request to seal is narrowly tailored to those portions of the Plaintiff's Memorandum that merits sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 10th day of July, 2017 in San Francisco, California.

/s/ Hayes P. Hyde
Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 10, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 10th day of July 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde